Standard Operating Procedure – The Collection and Resolution of Applicant Registration Data

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| Author(s): | Al Tariq Sheik |

# PURPOSE:

DID solutions often integrate de-duplication processes as part of their identity proofing framework. This involves verifying specific biographic attributes, such as name, age, and gender, alongside biometrics, such as fingerprints, as well as government-issued attributes, such as driver’s license and passport numbers, or taxpayer identification numbers. By undertaking such measures, the identity system can prevent duplicate enrolment and ensure the accuracy and reliability of the identity information collected. De-duplication processes are essential to prevent fraud and identity theft, which can have significant consequences for both individuals and organizations. Therefore, the integration of de-duplication processes into DID solutions is crucial to enhance the security and reliability of digital identity verification and enrollment processes.

# SCOPE:

This Standard Operating Procedure (SOP) applies to applicants who are 18 years old and above, as well as applicants who are applying in-person through their parent or guardian. The focus of this SOP is on the initial collection of DID-account holder data and resolution. For MAF, it is assumed that the applicant is applying in-person and may have limited documentation. Therefore, this SOP will reference the Minimum Supporting Documents (MSD) required for the initial collection of user data. The MSD includes essential documents such as birth certificates, passports, and driver's licenses. The SOP will outline the procedures to be followed to ensure that all relevant user data is collected accurately and efficiently, and any issues related to the documentation provided are resolved as quickly as possible. The primary objective of this SOP is to ensure that the initial collection of user data is carried out smoothly and efficiently, while maintaining the highest levels of accuracy and reliability.

# DEFINITIONS:

**Digital Identity (DID)** – An online personal identity system.

**Standard Operating Procedure (SOP)** – The functions, processes and procedures that should be followed by Applicants, Subscribers, Claimants and Admin.

**Minimal Acceptable** **Functionality (MAF)** – The most fundamental scenario in which a Digital Identity system should operate.

**Minimum Support Documents (MSD)** – The fundamental documents that can be used to validate and verify an identity, such as birth certificates, driver’s licenses and passports.

**Applicant** – A person who applies for a Digital Identity.

**Admin/Administration** – The staff of the Digital Identity provider, who conducts Onboarding and Identity Lifecycle Management.

**New Subscriber Registration Form** – The form that is completed by an Applicant in-person to register for a Digital Identity.

# PROCESSES AND PROCEDURE:

A. Applicant who are Age 18 and above registers for Digital ID in-person for themselves:

1. The applicant requests the New Subscriber Registration Application Form from the administrator.
2. The applicant completes the form with their name, date of birth, postal address, Next of Kin, share code, etc.
3. The applicant attaches copies of the minimum supporting documents, such as their driving license and passport.
4. The applicant submits the New Subscriber Registration Form and the minimum supporting documents.
5. Informing Applicants of Data Use Purpose:

* The administrator explicitly informs the applicant about the purposes for which their data will be collected, processed, and used at the time of registration.
* A section is included in the registration form where the applicant must acknowledge understanding and consent to these purposes.

1. Pseudo-anonymisation of Collected Data:

* Once the application is submitted, the administrator initiates the pseudo-anonymisation process by separating identifying information (e.g., name, date of birth) from other data and replacing it with pseudo-identifiers.
* This process is explained to the applicant, highlighting the enhanced privacy and security measures taken to protect their personal information.

B. Parent or Guardian register for Digital ID on behalf of ward:

1. The parent or guardian requests the New Subscriber Registration Application Form from the administrator.
2. The parent or guardian completes the form with the name, date of birth, address, etc. of the ward.
3. The parent or guardian attaches the minimum supporting documents, such as the ward's passport and a legal document showing the relationship between the ward and the guardian.
4. The parent or guardian submits the New Subscriber Registration Form and the minimum supporting documents on behalf of the ward.
5. Clarification of Data Collection Purpose for Minors:

* The registration form includes a clear statement of the purposes for data collection specific to minors, ensuring guardians are fully informed.
* Guardians provide their consent by signing the form, acknowledging they understand and agree to the data collection purposes.

1. Pseudo-anonymisation of Minor’s Data:

* For registrations on behalf of wards, a similar pseudo-anonymisation process is applied to the ward's data, ensuring the guardian is informed about this privacy-enhancing measure.

C. Admin receives application form and initiates digital registration:

1. The application form for new subscriber registration and the minimum required supporting documents are evaluated for completeness by checking for any empty fields that need to be filled out.
2. The administrator digitizes the physical registration data by creating a new application, saving it, and submitting it.
3. The administrator carries out biometric collection as outlined in Process D.
4. The administrator generates an 11-digit registration ID.
5. The administrator prints an acknowledgment receipt containing the registration ID.
6. Regular Review and Update of Data Collection Purposes:

* The administrator periodically reviews the purposes for data collection to ensure they align with current legal requirements and organizational needs.
* Any changes in the purpose of data collection are documented, and mechanisms are put in place to inform existing subscribers and obtain their consent if necessary.

1. Implementation of Pseudo-anonymisation in Digital Registration:

* During digitization, personal data is pseudo-anonymised at the database level. Identifiable information is stored separately and securely, accessible only under strictly controlled conditions.

D. *Biometric collection is carried out immediately without requiring any validation. However, if validation is needed, proceed to* SOP A.2:

1. The administrator requests biometric data from the applicant.
2. The applicant supplies their fingerprint of their choice as outlined in SOP A.2.
3. The fingerprint data is recorded in the digital registration system and stored in the database.
4. The applicant supplies their driving license, passport, share code, etc. for validation.
5. Secure Storage and Access:

* Biometric data, considered sensitive, is stored using a secure, pseudo-anonymised format, ensuring it is processed separately from other personal identifiers.

E. *To obtain the minimum supporting documents, follow these steps:*

1. The applicant visits public records websites such as driving license for enrollment.
2. The applicant input details such as their Driving License Number, National Insurance Number, and Post Code.
3. The applicant validates their account.
4. The applicant receives a share code, consisting of 8 alphanumeric characters.
5. The applicant provides the share code in the application form.

# SOP APPENDICES:

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|  | 1.0 | 18-04-2023 | First Approval |